

1 THE HONORABLE JAMES L. ROBART
2
3
4
5
6
7
8

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 ANNA PATRICK, DOUGLAS MORRILL,
10 ROSEANNE MORRILL, LEISA
11 GARRETT, ROBERT NIXON,
12 SAMANTHA NIXON, DAVID
13 BOTTONFIELD, ROSEMARIE
14 BOTTONFIELD, TASHA RYAN,
15 ROGELIO VARGAS, MARILYN DEWEY,
16 PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Case No. 2:23-cv-00630- JLR

STIPULATION BETWEEN PLAINTIFFS
AND DEFENDANT HAPPY HOUR MEDIA
GROUP, LLC
AND
~~[PROPOSED]~~ ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S
MOTION TO DISMISS

Noted: October 31, 2023.

17 Plaintiffs,

18 v.

19 DAVID L. RAMSEY, III, individually;
20 HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
21 LAMPO GROUP, LLC, a Tennessee
limited liability company,

22 Defendants.

26 STIPULATION BETWEEN PLAINTIFFS AND HAPPY
HOUR AND [PROPOSED] ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S MOTION
TO DISMISS – PAGE 1
Case No. 2:23-cv-00630-JLR

1 WHEREAS, Happy Hour has filed a motion to dismiss the Complaint (Dkt. 32), which is
2 noted for consideration on November 10, 2023,

3 WHEREAS, by stipulated order (Dkt. 24), the Opposition to Happy Hour's motion to
4 dismiss is due on November 2 and the reply is due on November 10, 2023,
5

6 WHEREAS, on October 26, 2023, Plaintiffs moved to amend their complaint with a noted
7 hearing date of November 17, 2023 (Dkt. 40),
8

9 WHEREAS, under the present schedule, the Plaintiffs and Happy Hour would complete
10 the briefing on the motion to dismiss before knowing whether and to what extent the Complaint
11 will be amended,
12

13 WHEREAS, having the Court consider the motion to dismiss before it decides the motion
14 to amend could lead to a need to renew or alter the motion to dismiss or otherwise use judicial time
inefficiently or create confusion,
15

16 WHEREAS, the Plaintiffs and Happy Hour have met and conferred in an attempt to
17 promote efficiency,
18

19 THEREFORE, Plaintiffs and Happy Hour stipulate that:
20

21 1. Happy Hour may withdraw its pending motion to dismiss without prejudice to Happy
Hour's right to re-file the motion to dismiss or to file an amended motion to dismiss;
22

23 and
24

25 2. The deadline for Happy Hour to file its motion to dismiss will be the first Thursday that
26 is not fewer than ten court days after the Court denies the pending motion for leave to
amend the complaint or the Plaintiffs file their first amended complaint after being
given leave to do so.

27 STIPULATION BETWEEN PLAINTIFFS AND HAPPY
28 HOUR AND [PROPOSED] ORDER AMENDING
29 DEADLINES RELATED TO HAPPY HOUR'S MOTION TO
30 DISMISS – PAGE 2
31 Case No. 2:23-cv-00630-JLR

1

2 **ALBERT LAW PLLC**

3

By: s/ Gregory W Albert

4

Gregory W Albert, WSBA #42673
Jonah L Ohm Campbell, WSBA #55701
Tallman Harlow Trask, IV, WSBA #60280
3131 Western Ave, Suite 410
Seattle, WA 98121
Phone: (206) 576-8044
Fax: 425-659-2678
Email: greg@albertlawpllc.com
jonah@albertlawpllc.com
tallman@albertlawpllc.com

5

6

7

8

9

FRIEDMAN RUBIN PLLC (SEATTLE-DOWNTOWN)

10

11

By: s/ Roger S. Davidheiser

12

Roger S. Davidheiser, WSBA #18638
1109 1st Ave Ste 501
Seattle, WA 98101-2988
Phone: (206) 501-4446
Fax: 206-623-0794
Email: rdavidheiser@friedmanrubin.com

13

14

15

16

Attorneys for Plaintiffs

17

18

19

20

21

22

23

24

25

26

STIPULATION BETWEEN PLAINTIFFS AND HAPPY
HOUR AND [PROPOSED] ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S MOTION TO
DISMISS – PAGE 3
Case No. 2:23-cv-00630-JLR

CORR CRONIN LLP

By: s/ Jack Lovejoy

Jack Lovejoy
1015 Second Avenue, Floor 10
Seattle, WA 98104-1001
Phone: (206) 625-8600
Email: jlovejoy@corrcronin.com

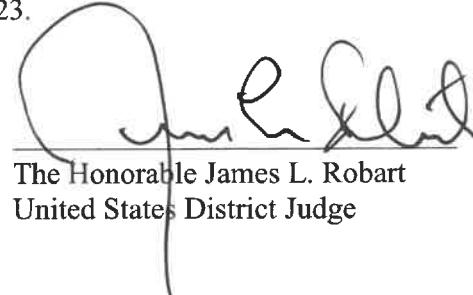
Attorney for Defendant Happy Hour Media Group, LLC

JLR

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this 31ST day of Oct., 2023.


The Honorable James L. Robart
United States District Judge

STIPULATION BETWEEN PLAINTIFFS AND HAPPY
HOUR AND [PROPOSED] ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S MOTION TO
DISMISS – PAGE 4
Case No. 2:23-cv-00630-JLR